

**To:** GAVELL FILE [Justine/Kevin/Amy]

**From:** ATTY. GAL/AMC

**Date:** 12/4/09

**Re:** BASIC FACTS

I have the initial pleadings and have heard briefly from each of the parent's lawyers and have been informed of the following:

Mona (mom) and Howard (dad) Gavell were married on April 15, 1990 and have three children: Justine, age 13; Kevin, age 6; and Amy, age 18 months. Both parents are 42 years of age and in good physical health.

The parties are currently residing together during the pendency of the action, but this may not be working out well.

**Education/Employment-**

Mom is a college graduate and dad went to tech school. Dad is an HVAC technician and has been self-employed for the past 2 years. Mom maintains the books, runs the office and has set up a website for the business, which is run from the family home. Mom had been employed until Justine was born and has been a stay at home mom ever since aside from working as of late with dad in the new business. Dad is also a volunteer firefighter.

**Religion-**

Mom is a devout Catholic and an organic earth mother. Dad was born a Catholic but has not stayed very active in the Church. The parties did agree to raise their children in the Catholic faith before Justine was born.

**Extended Family-**

Mom's parents own the house mom and the family live in and they also own another house and live near by. Dad's parents are divorced and do not live nearby. (Texas, I think.) Dad and his father are close as his father raised

him after the divorce (he was 13 when they separated). His mother is apparently an alcoholic.

Family dynamic-

(According to dad's lawyer)

Mom suffers from an anxiety disorder. She suffered from post-partum depression after each birth. Dad maintains that mom is not doing well at all right now. She may be on medication daily to control her depression and possible suicidal tendencies. Mom has no interest in sex, which may have been one cause for the breakdown of the marriage. Mom does provide much of the care for the children when she is feeling well. Dad has always been a good provider and picks up the slack when mom is feeling depressed. Currently dad is Kevin's soccer/golf coach. Mom does not have a good relationship with Justine.

(According to mom's lawyer)

Confirmed that mom suffers from an anxiety disorder, takes medication, did suffer from post-partum depression after the birth of each child, and was worse in the past. He assures me, however, that mom's disorder is under control and she takes the medication merely as a precaution. Mom's medication caused her to lose interest in sex. Dad had an affair with a girl half his age who is still his girlfriend, and Dad is involving the new girlfriend in the caretaking. Mom has always cared for the children and is involved with their teachers/school activities, etc.

(According to both lawyers)

Justine has been sex-ting (sending sexually explicit messages concerning herself via text messages). Both parents feel she is acting out because of the divorce.

Kevin has possible learning disabilities.

Amy is apparently developing just fine for her age.